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GIGANEWS, INC. and LIVEWIRE
SERVICES, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION – LOS ANGELES

GIGANEWS, INC., a Texas corporation;
LIVEWIRE SERVICES, INC., a Nevada
corporation,

Plaintiffs,

v.

PERFECT 10, INC., a California
corporation; NORMAN ZADA, an
individual; and DOES 1-50, inclusive,

Defendants.

Case No.: 2:17-cv-05075-AB (JPR)

DISCOVERY MATTER
Before Hon. Jean P. Rosenbluth

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS AND FOR
PROTECTIVE ORDER**

Date: July 19, 2018
Time: 10:00 a.m.
Courtroom: 690, 6th Floor
Discovery Cutoff: July 27, 2018
Trial Date: January 15, 2019

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO
COMPEL PRODUCTION OF DOCS AND FOR PROTECTIVE
ORDER

CASE NO.: 2:17-cv-05075-AB (JPR)

1 The Court has considered the joint stipulation on the motion by Plaintiffs
 2 Giganews, Inc. and Livewire Services, Inc. to compel production of documents by
 3 Defendants and for a protective order. Finding good reasons to do so, the Court
 4 hereby GRANTS Plaintiffs' motion and ORDERS as follows:

5 1. Defendants Perfect 10, Inc. and Norman Zada shall (1) serve amended
 6 written responses to Giganews's Request for Production No. 6 to Perfect
 7 10 and Giganews's Request for Production No. 6 to Norman Zada, stating
 8 that they will produce all responsive non-privileged documents and (2)
 9 produce all non-privileged documents responsive to those requests within
 10 fourteen (14) days of this Order. The production shall include, but not be
 11 limited to:

- 12 a. Quickbooks files and information for Perfect 10, 2016 to the
- 13 present.
- 14 b. Quickbooks files and information for Norman Zada, January 1,
- 15 2011 to the present.
- 16 c. Bank of America statements for January 2011 to March 2012, May
- 17 2012, January 2016, and April 2016 to the present.
- 18 d. Bank of America reconciliation details and summaries for January
- 19 2011 through September 2012 and April 2014 to the present.
- 20 e. Wells Fargo statements for October and November 2011, April
- 21 2012, June through September 2012, and November 2012 to the
- 22 present.
- 23 f. Perfect 10 financial statements for January, February, April, June
- 24 through August, October, and November 2011; January, February,
- 25 April, May, July, August, and November 2012; January, February,
- 26 April, May, and July through November 2013; January, February,
- 27 April, May, July, August, and October 2014; and November 2014
- 28

1 to the present.

2 g. Complete tax returns for Perfect 10 and Mr. Zada, January 1, 2011
3 to present.

4 h. Statements for all of Mr. Zada's investment, bank, and credit card
5 accounts from January 1, 2011 to the present, including but not
6 limited to: Bank of America, Chase, Wells Fargo Advisors, Morgan
7 Stanley, Putnam, and American Express accounts.

8 2. Defendants may not proceed with the deposition of Giganews co-CEO
9 Ronald Yokubaitis.

10 3. Plaintiffs need not respond to Perfect 10's requests for admission except
11 for requests 128-206, to which Plaintiffs shall respond within fourteen
12 (14) days of this Order. Defendants may serve no additional requests for
13 admission.

14
15 **IT IS SO ORDERED.**

16
17 Dated: _____, 2018

By: _____
Hon. Jean P. Rosenbluth
United States Magistrate Judge